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Counterclaim-Plaintiff McAfee, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

TVIIM, LLC,

Plaintiff,

v.

MCAFEE, INC.,

Defendant.

Civil Action No. 3:13-CV-04545-HSG

**AMENDED DECLARATION OF
LAURIE CHARRINGTON IN
SUPPORT OF MCAFEE'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL (MCAFEE'S
OPPOSITION TO MOTION FOR
PARTIAL SUMMARY JUDGMENT)**

I, Laurie Charrington, declare and state as follows:

1. I am an attorney at Intel Corporation (“Intel”). My title is Senior Litigation Counsel, Law and Policy Group.

2. Pursuant to Local Rules 7-11 and 79-5, I submit this Declaration in support of McAfee’s Administrative Motion to File Documents under Seal (D.I. 128) and in response to the Court’s Order Denying Motions to Seal (D.I. 171), to confirm that Exhibit 14 to the Declaration of Joseph J. Mueller (“Mueller Declaration”) in Support of McAfee’s Opposition to Motion for Partial Summary Judgment (“Opposition”) is confidential and sealable. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would competently testify to them under oath.

3. McAfee, Inc. (“McAfee”) is a wholly owned subsidiary of Intel. As part of my role at Intel, I am familiar with McAfee’s efforts to ensure that product development and design information are not disclosed outside select groups of individuals within McAfee.

4. The requested relief is necessarily and narrowly tailored to protect the confidentiality of the information contained in the following exhibits.

5. McAfee will lodge with the court and serve on plaintiff TVIIM, LLC an unredacted copy of the exhibit referenced in this declaration, highlighting in green the specific portions of each page in each exhibit to which McAfee maintains a claim of confidentiality. Should the court grant TVIIM’s Motion to Seal the unredacted copy of these exhibits (Dkt. 118), McAfee will publicly file redacted versions of these exhibits.

6. **Exhibit 14.** Exhibit 14 to the Mueller Declaration contains excerpts from the January 16, 2015 Expert Report of Dr. Moses Garuba, TVIIM’s infringement expert in this litigation. TVIIM designated this report as “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (D.I. 62). Certain portions of pages 32 and 39 of this report discuss or otherwise reference highly confidential McAfee product design, structural components, and functionality. This information could be used by McAfee’s competitors to McAfee’s disadvantage, particularly because it reveals McAfee’s internal product design and

1 other proprietary information. It is McAfee's practice and policy to maintain the confidentiality
2 of this information and its disclosure would be harmful to McAfee.

3 I declare under the penalty of perjury under the laws of the United States of America that
4 the forgoing is true and correct to the best of my knowledge. Executed this 15th of June, 2015 at
5 Santa Clara, California.

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8 Dated: June 15, 2015

By: /s/ Laurie Charrington

9 Laurie Charrington
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CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION

I hereby attest that concurrence in this filing had been obtained from Laurie Charrington and records to support this concurrence are on file.

Dated: June 15, 2015

/s/ Christine Capuyan

Christine Capuyan

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the United States that a true and correct copy of the above and foregoing document has been served on June 15, 2015, to all counsel of record who are deemed to have consented to electronic service via the Court's ECF system per Civil Local Rule 5-1.

Dated: June 15, 2015

/s/ Christine Capuyan

Christine Capuyan

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